

REMARKS

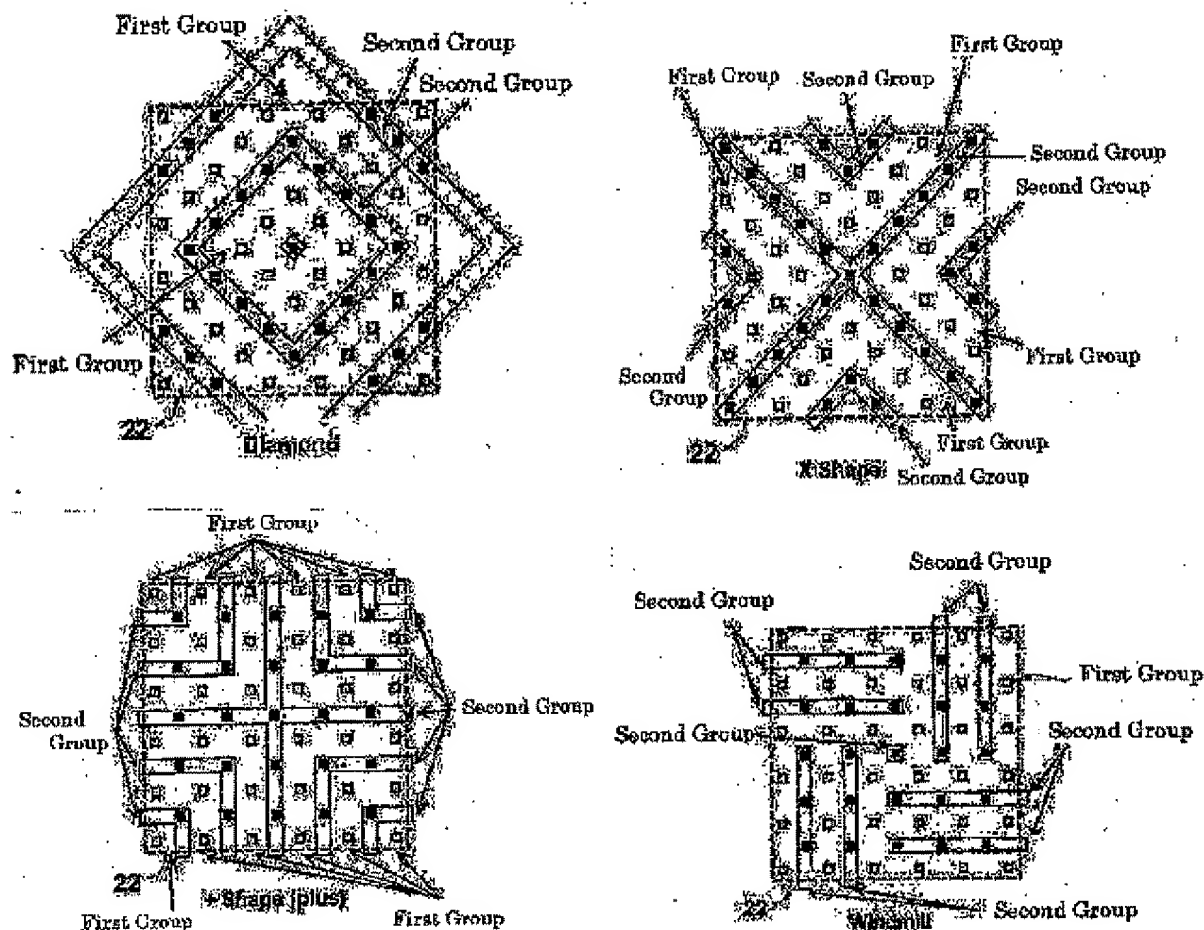
This application has been reviewed in light of the FINAL REJECTION mailed April 28, 2009 and subsequent Advisory Action mailed August 5, 2009. Applicant requests that this amendment submitted under 37 C.F.R. §114 along with a Request for Continued Examination (RCE) be entered and the examination of the application be continued. Reconsideration of this application in view of the below remarks is respectfully requested. Claims 1 – 11 are pending in the application with Claim 1 being in independent form.

In the present amendment, Claim 1 is amended to recite "...the first group of I/O cells are arranged in a first row and a second row disposed on an inner position relative to the first row, the second group of I/O cells are arranged in a first row and a second row disposed on an inner position relative to the first row, each of the first and second rows of the first group of I/O cells is arranged parallel to an outer periphery of the semiconductor member, and each of the first and second rows of the second group of I/O cells is arranged parallel to an outer periphery of the semiconductor member..." Support for the recited features of Claim 1 is shown in FIG. 4 and FIG. 7, for example, and the relevant portions of the specification. Therefore, no new subject matter is introduced into the disclosure by way of the present amendment.

Applicant respectfully submits that the cited prior art reference, namely U.S. Patent No. 6,111,756 issued to Moresco, fails to anticipate or suggest all the features recited in Applicant's independent Claim 1.

Specifically, the Advisory Action contends that "...the diamond configuration of FIG. 14 satisfies all of the claimed criteria including point 1. For example, when the second group is considered as the portion of the black power cells in a diamond with 5 pads per side and the first group is considered as the white ground pads with 5 pads per side on the diamond, the second

group is disposed on an inner position with respect to the first group. Further, the fact that a portion of black power cells is disposed outside of the white ground pads does not compromise the fact that a second group of I/O cells exists within a first group of I/O cells.” Additionally, the Advisory Action notes that “...the term “row” can be interpreted as one side of each of the groups of cells. For instance, Moresco can be interpreted as having the second group (considered as the portion of the black power cells in a diamond with 5 pads per side) where each side of the diamond shape constitutes a row, therefore there would be 4 rows of 5 pads. The claim language does not require the specific arrangement of the rows of each group in relation to one another.” Finally, the Advisory Action notes that “...this is just one interpretation of how Figure 14 reads on the claim language and that Moresco’s arrangements in Figure 14 can be interpreted in other manners.”



However, in view of the configurations in FIG. 14 (shown above), it is clear that Moresco does not teach a first group of I/O cells arranged in a first row and a second row disposed on an inner position relative to the first row, and a second group of I/O cells arranged in a first row and a second row disposed on an inner position relative to the first row; where each of the first and second rows of the first group of I/O cells are arranged parallel to an outer periphery of the semiconductor member, and each of the first and second rows of the second group of I/O cells are arranged parallel to an outer periphery of the semiconductor member, as recited in Applicant's Claim 1.

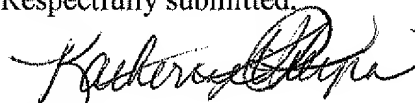
Consequently, Applicant respectfully submits that Claims 1 – 11 are allowable over the cited prior art references.

CONCLUSIONS

In view of the foregoing amendments and remarks, it is respectfully submitted that all claims presently pending in the application, namely, Claims 1 – 11 are believed to be in condition for allowance and patentably distinguishable over the art of record.

If the Examiner should have any questions concerning this communication or feels that an interview would be helpful, the Examiner is requested to call Applicant's undersigned attorney at the number indicated below.

Respectfully submitted,



Katherine R. Vieyra

Registration No. 47,155

SCULLY, SCOTT, MURPHY & PRESSER, P.C.
400 Garden City Plaza - Ste. 300
Garden City, New York 11530
(516) 742-4343

PJE/KRV/DAT:ab